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ANTONIO TOLENTINO

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
ANTONIO TOLENTINO,
LUCILA CALDERON
Defendants.

) Case No.:25-CR-00094 WBS
) STIPULATION AND ORDER TO
) CONTINUE STATUS CONFERENCE
) Date: FEBRUARY 23, 2026
) Time: 9:00 a.m.
) Judge: Hon. Shubb

STIPULATION

The United States of America through its undersigned counsel, Caily Nelson Assistant United States Attorney, together with Attorney Dina Santos, counsel for Antonio Tolentino; and Attorney Timothy Warriner, counsel for Lucila Calderon hereby stipulate the following:

1. The Status Conference was previously set for December 15, 2025. By this stipulation, the parties now move to continue the Status Conference to February 23, 2026, at 9:00 a.m. and to exclude time between December 15, 2025, and February 23, 2026, under the Local Code T-4 (to allow defense counsel time to prepare).

1 2. The parties agree and stipulate, and request the Court find the following:

2 a. A continuance is requested to continue to allow the Defense to meet with the

3 Client, review recently produced discovery, conduct investigation, and discuss

4 a potential resolution.

5 b. Counsel for the Defendant believes the failure to grant a continuance in this

6 case would deny defense counsel reasonable time necessary for effective

7 preparation, taking into account the exercise of due diligence.

8 c. The Government does not object to the continuance.

9 d. Based on the above-stated findings, the ends of justice served by granting the

10 requested continuance outweigh the best interests of the public and the

11 defendants in a speedy trial within the original date prescribed by the Speedy

12 Trial Act.

13 e. For the purpose of computing time under the Speedy Trial Act, 18 United

14 States Code Section 3161(h)(7)(A) within which trial must commence, the

15 time period of December 15, 2025, and February 23, 2026, inclusive, is

16 deemed excludable pursuant to 18 United States Code Section 3161(h)(7)(A)

17 and (B)(iv), corresponding to Local Code T-4 because it results from a

18 continuance granted by the Court at defendant's request on the basis of the

19 Court's finding that the ends of justice served by taking such action outweigh

20 the best interest of the public and the defendant in a speedy trial.

21 3. Nothing in this stipulation and order shall preclude a finding that other provisions

22 of the Speedy Trial Act dictate that additional time periods are excludable from

23 the period within which a trial must commence.

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27 **IT IS SO STIPULATED.**

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1 DATED: December 3, 2025

Eric Grant
United States Attorney

2
3 /s/ Caily Nelson
CAILY NELSON
4 Assistant U.S. Attorney

5 DATE: December 3, 2025

6 /s/ Dina Santos
DINA SANTOS
7 Attorney for Antonio Tolentino

8 DATE: December 3, 2025

9 /s/ Timothy Warriner
TIMOTHY WARRINER
Attorney for Lucila Calderon

10 **ORDER**

11 The Court has read and considered the Stipulation Regarding Excludable Time
12 Period Pursuant to Speedy Trial Act, filed by the parties in this matter. The Court hereby
13 finds that the Stipulation, which this Court incorporates by reference into this Order,
14 demonstrates facts that provide good cause for a finding of excludable time pursuant to
15 the Speedy Trial Act, 18 U.S.C. § 3161.

16 The Court further finds that: (i) the ends of justice served by the continuance
17 outweigh the best interest of the public and defendant in a speedy trial; and (ii) failure to
18 grant the continuance would deny defense counsel the reasonable time necessary for
19 effective preparation, taking into account the exercise of due diligence.

20 Nothing in this Order shall preclude a finding that other provisions of the Speedy
21 Trial Act dictate that additional time periods are excluded from the period within which
22 trial must commence.

23 **IT IS SO ORDERED.**

24 Dated: December 4, 2025

25 
26 WILLIAM B. SHUBB
27 UNITED STATES DISTRICT JUDGE
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